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NATURALS, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JAMIE COX and VICENTE BACA,
individually and on behalf of all others similarly
situated,

Plaintiffs,

vs.

LILYANA NATURALS, LLC,

Defendant.

Case No. 4:23-cv-03568

**JOINT STIPULATION TO CONTINUE
DEFENDANT LILYANA NATURALS'
DEADLINE TO FILE A RESPONSIVE
PLEADING TO PLAINTIFFS' CLASS
ACTION COMPLAINT**

Judge: Hon. Jeffrey S. White
Dept.: Courtroom 5
Complaint Filed: July 18, 2023

TO ALL PARTIES, ATTORNEYS OF RECORD, AND THE COURT:

Plaintiffs JAMIE COX and VICENTE BACA (“Plaintiffs”) and Defendant LILYANA NATURALS, LLC (“LilyAna” or “Defendant”), by and through their undersigned counsel, and pursuant to Federal Rules of Civil Procedure, Rule 6(b) and Local Civil Rule 6-(a), respectfully submit this Joint Stipulation to Extend Defendant’s Time to Respond to Plaintiff’s Amended Complaint and Related Deadlines and hereby jointly agree and stipulate to the following:

WHEREAS, on July 18, 2023, Plaintiffs filed a class action Complaint against Defendant in the Northern District of California, Case No. 4:23-cv-03568;

WHEREAS, on August 8, 2023, Plaintiffs served Defendant with copies of the Summons and Complaint, among other documents;

WHEREAS, Federal Rule of Civil Procedure 12(a) requires Defendant to file a responsive pleading within 21 days after being served the summons and complaint, or by August 29, 2023;

WHEREAS, Defendant requires additional time to respond to the Complaint’s allegations;

WHEREAS, neither counsel for Plaintiffs nor counsel for Defendant oppose allowing additional time for Defendant to respond to the Complaint or for Plaintiffs to file its opposition to any motions challenging the Complaint;

WHEREAS, the extension will not alter the date of any event or any deadline already fixed by Court order;

THEREFORE, THE PARTIES STIPULATE BY AND THROUGH THEIR COUNSEL, AS FOLLOWS: Defendant’s deadline to file a responsive pleading, including, but not limited to, an Answer, Motion to Strike, and/or Motion to Dismiss to Plaintiffs’ Complaint shall be extended by 30 days from August 29, 2023 through and including September 28, 2023.

IT IS SO STIPULATED AND AGREED.

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JOINT STIPULATION TO CONTINUE DEFENDANT LILYANA NATURALS’ DEADLINE TO
FILE A RESPONSIVE PLEADING TO PLAINTIFFS’S CLASS ACTION COMPLAINT

STIPULATION

IT IS STIPULATED by and between Plaintiffs JAMIE COX and VICENTE BACA and Defendant LILYANA NATURALS, LLC, through their respective counsel, that the date by which LilyAna must serve its Answer or other responsive pleading to Plaintiffs' Complaint be extended from August 29, 2023 through and including September 28, 2023.

DATED: August 23, 2023

FOLEY & LARDNER LLP

Erik K. Swanholt
Troy S. Tessem

/s/ Erik K. Swanholt

Erik K. Swanholt
Attorneys for Defendant
LILYANA NATURALS,
LLC

DATED: August 23, 2023

BURSOR & FISHER, P.A.

L. Timothy Fisher
Jenna L. Gavenman

/s/ L. Timothy Fisher

L. Timothy Fisher
Attorneys for Plaintiffs
JAMIE COX and
VICENTE BACA

Pursuant to Local Rule 5-1(h)(3), I attest that the other signatory listed, and on whose behalf the filing is submitted, concurs in the filing content and has authorized the filing.

DATED: August 23, 2023

/s/ Erik K. Swanholt

Erik K. Swanholt

JOINT STIPULATION TO CONTINUE DEFENDANT LILYANA NATURALS' DEADLINE TO
FILE A RESPONSIVE PLEADING TO PLAINTIFFS'S CLASS ACTION COMPLAINT

PROOF OF SERVICE

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to this action; my current business address is 555 South Flower Street, Suite 3300, Los Angeles, CA 90071-2418.

On August 23, 2023, I served the foregoing document(s) described as: **JOINT STIPULATION TO CONTINUE LILYANA NATURALS' DEADLINE TO FILE A RESPONSIVE PLEADING** on the interested parties in this action as follows:

BURSOR & FISHER, P.A.

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Attorneys for Plaintiffs X BY CM/ECF NOTICE OF ELECTRONIC FILING

— I electronically filed the document(s) with the Clerk of the Court by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system. Participants in the case who are not registered CM/ECF users will be served by mail or by other means permitted by the court rules.

 BY E-MAIL

— I served the foregoing document via email to the addresses above at the email addresses listed therein.

 X Executed on August 23, 2023, at Los Angeles, California.

 X I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

 X I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

/s/ Lynne Oropeza

Lynne Oropeza